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14 **UNITED STATES DISTRICT COURT**  
15 **CENTRAL DISTRICT OF CALIFORNIA**

16 JULIA HUBBARD, et al.,  
17  
18 Plaintiffs,

19 v.

20 TRAMMELL S. CROW, JR., et al.,  
21 Defendants.

Case No. 2:22-cv-7957-FLA-MAA

**JOINT STIPULATION AND  
APPLICATION FOR LEAVE TO  
EXTEND PAGE LIMITS ON  
MEMORANDA OF POINTS AND  
AUTHORITIES AND MODIFY  
BRIEFING SCHEDULE**

[[Proposed] Order submitted  
concurrently herewith]

1 This Joint Stipulation and Application for Leave to Extend Page Limits on  
2 Memoranda of Points and Authorities and Modify Briefing Schedule is made by and  
3 between Plaintiffs Julia Hubbard and Kayla Goedinghaus (collectively, “Plaintiffs”)  
4 and Defendant Trammell S. Crow, Jr. (“Mr. Crow”) and seeks leave for them to file  
5 memoranda of points and authorities that are up to twenty-eight pages long, a reply  
6 that is up to seventeen pages long, and to modify briefing schedule in connection  
7 with Mr. Crow’s forthcoming motion to dismiss under Federal Rule of Civil  
8 Procedure 12(b)(6). A proposed order is submitted concurrently herewith.

9 **RECITALS**

10 WHEREAS, on November 1, 2022, Plaintiffs initiated this case by filing a  
11 sixty-four page complaint against Mr. Crow and twenty-eight other defendants  
12 purporting to allege four causes of actions for (1) violation of the Trafficking and  
13 Violence Protection Act of 2000 under 18 U.S.C. § 1591(a), (2) violation of labor  
14 trafficking laws under 18 U.S.C. § 1589, (3) violation of the Racketeer Influenced  
15 and Corrupt Organizations Act under 18 U.S.C. § 1962(c), and (4) violation of the  
16 Racketeer Influenced and Corrupt Organizations Act under 18 U.S.C. § 1962(d).

17 WHEREAS Mr. Crow anticipates filing a motion to dismiss each of the four  
18 causes of action pursuant to Federal Rule of Civil Procedure 12(b)(6) (“Motion to  
19 Dismiss”) on January 9, 2023.

20 WHEREAS the Local Rules for the United States District Court for the  
21 Central District of California limit memorandums of points and authorities to 7,000  
22 words. (See Local Rule 11-6.1 amended, effective Dec. 1, 2022).

23 WHEREAS this Court’s Initial Standing Order provides that “[i]t governs this  
24 action and differs in some respect from the Local Rules.” (Initial Standing Order  
25 (Dkt. No. 24) at 2.)

26 WHEREAS this Court’s Initial Standing Order provides that “[m]emoranda  
27 of points and authorities shall not exceed twenty-five pages,” “[r]epplies shall not  
28

1 exceed fifteen pages,” and that the Court will grant an application to extend these  
2 page limitations where “good cause” is shown. (Id. at 5.)

3 WHEREAS, considering the length of the complaint, the nature of its  
4 allegations and complexity of the legal issues regarding Plaintiffs’ four causes of  
5 action, the Plaintiffs and Mr. Crow agree that good cause exists to expand the page  
6 limits in the Initial Standing order by three-pages for memoranda of points and  
7 authorities and by two-pages for replies to permit them to fully present the matters at  
8 issue to the Court in their respective papers.

9 WHEREAS the parties agree that they are available to attend a hearing on the  
10 Motion to Dismiss on March 24, 2023. (See id. at 4-5.)

11 WHEREAS under the Local Rules, a notice of motion shall be filed at least  
12 twenty-eight days before the date set for hearing, opposing papers are due not later  
13 than twenty-one days before the hearing, and replies are due not later than fourteen  
14 days before the hearing. (Local Rules 6-1, 7-9, 7-10.)

15 WHEREAS, to facilitate the briefing regarding the Motion to Dismiss, the  
16 parties agree to a modified briefing schedule where Mr. Crow will file the Motion to  
17 Dismiss on January 9, 2023; Plaintiffs will file their response by February 15, 2023;  
18 Mr. Crow will file his reply by March 10, 2023; and the hearing will be on March  
19 24, 2023, at 1:30 p.m.

### 20 **STIPULATION**

21 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by  
22 and between Plaintiffs and Mr. Crow, subject to the Court’s approval, as follows:

23 1. Mr. Crow shall have three additional pages for his memorandum of  
24 points and authorities in support of his forthcoming Motion to Dismiss, thereby  
25 increasing the page limit to a total of twenty-eight pages.

26 2. Plaintiffs shall have three additional pages for their memorandum of  
27 points and authorities in response to Mr. Crow’s forthcoming Motion to Dismiss,  
28 thereby increasing the page limit to a total of twenty-eight pages.

5 || a. Motion to Dismiss – January 9, 2023

6 b. Response to Motion to Dismiss – February 15, 2023

7 c. Reply in Support of Motion to Dismiss – March 10, 2023

8 || d. Hearing on Motion to Dismiss – March 24, 2023, at 1:30 p.m.

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Kenneth Stone

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BALESTRIERE FARIELLO

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John G. Balestriere

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Anastasia Mazzella

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27 Pursuant to Local Rule of Civil Procedure 5-4.3.4(a)(2)(i), the filer of this

STIPULATION AND APPLICATION FOR LEAVE TO EXTEND  
PAGE LIMITS AND MODIFY SCHEDULE

1 is submitted, concur in the filing's content and have authorized the filing.

2 Dated: January 5, 2023

3  
4 By:   
5 Gerald E. Hawxhurst